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May 31, 2024

**BY EFILING**

The Honorable Jennifer L. Hall  
United States District Court  
for the District of Delaware  
844 N. King Street  
Wilmington, DE 19801

Re: *Freites, et al. v. Bolivarian Republic of Venezuela, et al.*  
Case No. 1:23-CV-00989-JLH

Dear Judge Hall:

I write on behalf of Defendants PDV Holding, Inc., CITGO Holding, Inc. (f/k/a PDV America, Inc.), and CITGO Petroleum Corporation (together, the “CITGO Defendants”) regarding the above-captioned action. Earlier today, the CITGO Defendants received notice via ECF that yesterday, May 30, 2024, Plaintiffs filed under seal an Emergency Motion for Immediate Relief Due to Unauthorized Disclosure of Sealed Information along with various attachments thereto (collectively, the “Emergency Motion”) (D.I. 54). Neither counsel for the CITGO Defendants nor the CITGO Defendants have yet been emailed a copy of the Emergency Motion or otherwise yet received a copy to their knowledge, and we are not able to access the sealed filing through the electronic docket. Accordingly, the CITGO Defendants hereby respectfully request a copy of the Emergency Motion and an opportunity to respond to the Emergency Motion within 14 days of receipt, as provided by Local Rule 7.1.2(b).

Counsel are available at the convenience of the Court should Your Honor have any questions.

Respectfully,

/s/ Alexandra M. Cumings

Alexandra M. Cumings (#6146)